

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAIL SECTION
MAY 1 1992

In the matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9

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To: The Commission

MAY - 1 1992

COMMENTS OF ALABAMA ELECTRIC COOPERATIVE, INC.

Federal Communications Commission
Office of the Secretary

Pursuant to Section 1.415 of the Commission's Rules, Alabama Electric Cooperative, Inc. hereby respectfully submits its comments on the Notice of Proposed Rulemaking (NPRM), FCC 92-20, released February 7, 1992, in the above captioned matter.

I. Introduction

The Alabama Electric Cooperative, Inc. (AEC) is a generation and transmission cooperative which provides wholesale power to 16 distribution cooperatives, four municipalities and one industry. These members serve the electrical needs of more than 250,000 residents of 36 counties in central and south Alabama and 10 counties in the Florida panhandle. The cooperative's mission, unchanged since its incorporation in 1941, is to provide a reliable source of electric power to it's members at the lowest possible cost.

AEC's telecommunications network, which provides the means for remote data acquisition and control of the electric system, is an essential part of our day-to-day operations. Point-to-point microwave in the 1850-1990 and 2100-2200 MHz bands is used to provide transmission service in all critical applications. This microwave system, consisting of 39 paths, is the center or backbone of our telecommunications network. We have considered alternate transmission methods, but we find point-to-point microwave at 2 GHz to be consistent with the maximum reliability and minimum cost criteria.

II. The 1850-2200 MHz Band Should Not Be Reallocated For The
Creation Of A Spectrum Reserve

AEC opposes a reallocation of spectrum in the 1850-2200 MHz band for the creation of a spectrum reserve for the development of emerging technologies. For our applications, there are no alternate methods which provide the same degree of performance, reliability, maintainability, and economy as 2 GHz point-to-point microwave. Changing to a different frequency band would be costly both in terms of equipment cost and lengthy service interruptions. Any such costs would necessarily be passed on to our members. It is highly unlikely that PCN or other emerging technologies will ever be deployed in our area. The bulk of our service territory doesn't even have cellular phone service.

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AEC urges the Commission to consider alternate bands, such as the 2500-2690 MHz "wireless cable" band as a possible "home" for the spectrum reserve.

III. Actions To Be Taken If 2 GHz Band Is Reallocated

AEC urges that if the 2 GHz band is reallocated for emerging technologies, the Commission should grant indefinite co-primary status for all existing 2 GHz microwave systems and should permit reasonable system modifications and expansions. AEC plans to utilize 2 GHz point-to-point microwave for many years to come.

AEC urges the Commission to adopt rules allowing for the use of voluntary negotiations between licensed users and new service providers. In no circumstances should new services in the band be authorized on an unlicensed basis or any other basis where existing users would be unable to secure reimbursement for relocation or to identify interference sources.

IV. The 1710-1850 MHz Band Should Be Made Available For Displaced 2 GHz Users.

AEC urges the FCC and the National Telecommunications and Information Administration (NTIA) to commence discussions to open the 1710-1850 MHz Federal government spectrum for use by displaced 2 GHz users on a co-primary, non-interference basis. This is the most desirable replacement spectrum from a technical and economic standpoint. It would cost approximately \$1,530,000 to change our entire microwave system to this band whereas it would cost almost \$3,500,000 to move to a band above 3 GHz.

V. The FCC Should Open The 4, 6, and 11 GHz Bands For Private Microwave Use

AEC supports the Utilities Telecommunications Council "Petition for Rulemaking," filed March 31, 1992, to make the 4 GHz, 6 GHz, and 11 GHz common carrier bands available for routine licensing in the Private Operational Microwave Service under Part 94, and to adopt appropriate channeling plans and technical standards to ensure that these bands are adequate to meet the needs of existing and future microwave systems.

VI. Conclusion

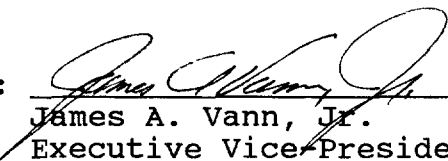
AEC is strongly opposed to the use of the 2 GHz microwave band as a spectrum reserve. If this is in fact necessary, then appropriate measures must be taken to protect existing licensees from undue costs and service interruptions. Among these measures should be: (1) available replacement spectrum under 3 GHz; (2) indefinite co-primary status for existing licensees and new technologies; and (3) a market based approach to negotiations between existing users and new technology licensees.

AEC depends heavily on its 2 GHz point-to-point microwave system, and any disruption or interference could not be tolerated.

Wherefore, The Premises Considered, AEC respectfully requests the Commission to consider these Comments in acting on the subject Notice of Proposed Rulemaking.

Respectfully submitted,
Alabama Electric Cooperative, Inc.

By:


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